

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION**

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GLOBAL DYNAMIC ENTERPRISES,  
LLC and NAJMEH KERMANI,

Plaintiffs,

v.

ECREATIVE GROUP, INC. d/b/a  
ENERGY & COMMODITIES GLOBAL,  
BRIAN JAMES LILLIE, ENTERPRISE  
HOLDINGS GROUP, LLC, and TRACY  
KAYE LILLIE,

Defendants.

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Case No.: 2:16-cv-00276-RWS

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**MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANTS**

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Pursuant to Local Rule 83.1(E), Baker & Hostetler LLP respectfully moves the Court for permission to withdraw as counsel of record for Defendants in this action on grounds of nonpayment of fees and failure to cooperate in the consummation of an enforceable settlement agreement reached by the parties to fully and finally resolve this case. As the Court knows, this is not the first time the undersigned has sought to withdraw from this case as a result of Defendants' failure to honor their fee agreement with Baker & Hostetler LLP. [DOC. 60.] Unlike the first time, however, Defendants have failed to cure their nonpayment of fees and as

a result Baker & Hostetler seeks to terminate its relationship with Defendants.

Counsel have given Defendants more than fourteen days prior written notice, and indeed multiple written notices, of their intention to request permission to withdraw. Those notices, a copies of which are attached hereto as Exhibits “A” and “B”, respectively, were sent to Defendants’ last known mail and email addresses.

Defendants’ last known mail and email addresses are:

Brian Lillie  
CEO and Owner  
Energy & Commodities Global  
Enterprise Holdings Group, LLC  
6421 Stone Ridge Court  
Kannapolis, North Carolina 28082  
brian@GOEHG.com

and

Tracy Lillie  
6421 Stone Ridge Court  
Kannapolis, North Carolina 28082  
brian@GOEHG.com

Defendants have previously agreed to waive any objection to this motion. Further, no objection was received by any Defendant in response to either of the notices provided regarding the undersigned’s intent to withdraw. Undersigned counsel’s does not believe that Defendants have selected another attorney to represent them in this matter.

Defendants have been informed that the corporate defendants are required to

be represented by an attorney licensed to practice law in this Court.

There are no scheduled proceedings in this action that would be affected by undersigned counsel's withdrawal as counsel for Defendants; however, the Court has directed the parties to submit a pretrial order on or before December 18, 2019.

The undersigned counsel further show the Court there should be no need for further proceedings in this matter. The parties reached an enforceable agreement to resolve this case on October 28, 2019. (See Exhibit "C".) All that remains to memorialize that settlement is for the parties to exchange executed copies of the binding agreement they have reached; but Defendants have failed to cooperate with the undersigned's efforts to facilitate the consummation of the agreement.

A proposed Order granting this Motion is attached hereto for the Court's consideration.

WHEREFORE, Baker & Hostetler LLP respectfully requests that the Clerk submit the attached proposed Order to the Court after 14 days of this filing, pursuant to Local Rule 83.1(E)(2)(d), and that the Court enter an Order granting the request to withdraw as counsel and providing such other relief as the Court deems just and proper.

Respectfully submitted this 6th day of December, 2019.

**BAKER & HOSTETLER LLP**

/s/ S. Derek Bauer

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**RULE 7.1(D) CERTIFICATE**

The undersigned counsel certifies that this document has been prepared with Times New Roman 14-point font in accordance with Local Rule 5.1.C.

Respectfully submitted this 6th day of December, 2019.

**BAKER & HOSTETLER LLP**

/s/ S. Derek Bauer

S. Derek Bauer

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the within and foregoing **Motion to Withdraw as Counsel for Defendants** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the attorneys of record.

Dated: December 6, 2019.

/s/ S. Derek Bauer  
S. Derek Bauer